

#3  
concluded  
18. (Once Amended) The apparatus of claim 14, wherein the Operations and Maintenance Center (OMC) establishes filtering criteria for the filtering means.

19. (Once Amended) The apparatus of claim 14, wherein the Operations and Maintenance Center (OMC) requests creation of event count criteria for the counting means.

### REMARKS

In an Office Action dated February 13, 2002, (paper no. 3) the Examiner rejected claims 1-20 under 35 U.S.C. §103(a) as being unpatentable over Glitho et al. (U.S. patent no. 6,233,449, hereinafter referred to as "Glitho"). The rejections are traversed and reconsideration is hereby respectfully requested.

Claim 1 has been amended to provide a system for reducing congestion in an Operations and Maintenance Center (OMC), the system comprising a network element having a filter, an event counter module, and a performance measurement module. Glitho teaches an OMC (that is, the OMCP of Glitho) that receives raw data from one or more network elements. The OMC then processes the raw data and determines whether one or more network elements are performing in accordance with predefined standards. A problem with the OMC taught by Glitho is that when the events generating the raw data are recurring, the determination of an event is recurring and frequent, and/or events are widespread among the one or more network elements serviced by the OMC, the communication link between the OMC and the one or more network elements can become clogged or the OMC can itself become overwhelmed with raw data, thereby hindering the performance by the OMC of its system management functions.

Claim 1 directly address this problem by providing a system that reduces the congestion in an OMC, an in particular an OMC such as the OMC taught by Glitho. Therefore, not only does Glitho not teach the limitations of claim 1, but in fact Glitho teaches away from claim 1 since the teachings of Glitho give rise to the problems that are solved by the teachings of claim 1. Therefore, the limitations of claim 1 are not taught or

suggested by Glitho. Accordingly, the applicants respectfully request that claim 1 may now be passed to allowance.

Since claims 2-6 depend upon allowable claim 1, the applicants respectfully request that claims 2-6 may now be passed to allowance.

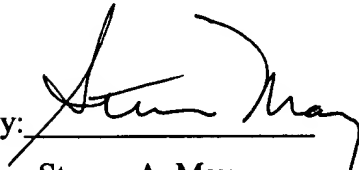
Claims 7 and 14 have been amended to provide a method for reducing the number of event notifications sent to an OMC by a network element serviced by the OMC. As noted above in regard to claim 1, claims 7 and 14 address a problem present in the teachings of Glitho. Once again, Glitho not teach the limitations of claims 7 and 14 and, in fact, teaches away from claims 7 and 14 since the teachings of Glitho give rise to the problems that are solved by the teachings of claim 1. Therefore, the limitations of claims 7 and 14 are not taught or suggested by Glitho. Accordingly, the applicants respectfully request that claims 7 and 14 may now be passed to allowance.

Since claims 8-13 depend upon allowable claim 7 and claims 15-20 depend upon allowable claim 14, the applicants respectfully request that claims 8-13 and 15-20 may now be passed to allowance.

Except for where the applicants have argued that an amendment was made to distinguish over a particular reference or combination of references, no amendment made was for the purpose of narrowing the scope of any claim. As the applicants have overcome all substantive rejections given by the Examiner and have complied with all requests properly presented by the Examiner, the applicants contend that this Amendment, with the above discussion, overcomes the Examiner's objections to and rejections of the pending claims. Therefore, the applicants respectfully solicit allowance of the application. If the Examiner is of the opinion that any issues regarding the status of the claims remain after this response, the Examiner is invited to contact the undersigned representative to expedite resolution of the matter.

Respectfully submitted,

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**Version with Markings to Show Changes Made**

1. (Once Amended) A system for reducing congestion in an Operations and Maintenance Center (OMC), the system comprising a network element that comprises [event notifications emitted to a manager comprising an agent, the agent including]:

a filter receiving event notifications from processes within the [agent] network element and providing filtered event notifications;

an event counter module coupled to the filter for receiving the filtered event notifications from the filter; and

a performance measurement module coupled to the event counter module for receiving event counter information from the event counter module and sending alarms to the manager.

3. (Once Amended) The system of claim 2, wherein [the manager establishes] selection criteria upon which the filter selects the filtered event notifications are established by the Operations and Maintenance Center (OMC).

4. (Once Amended) The system of claim 1, wherein the [manager] Operations and Maintenance Center (OMC) requests creation of event count objects upon which the event counter module creates event count information from the filtered event notifications

6. (Once Amended) The system of claim 1, wherein the performance measurement module emits an alarm to the [manager] Operations and Maintenance Center (OMC) if the event counter information exceeds a threshold.

7. (Once Amended) A method for reducing the number of event notifications sent to [a manager] an Operations and Maintenance Center (OMC) by a network element serviced by the OMC, the method comprising the steps of:

[a)] filtering event notifications to provide filtered event notifications;

[b)] counting the filtered event notifications to generate event count information from the filtered event notifications; and

[c)] emitting an alarm if the event count information exceeds a threshold.

8. (Once Amended) The method of claim 7, wherein filtering event notifications comprises the steps of:

- [a)] receiving the event notifications [from an agent]; and
- [b)] selecting the event notifications based on selection criteria to provide filtered event notifications.

9. (Once Amended) The method of claim 7, wherein counting the event notifications comprises the steps of:

- [a)] receiving filtered event notification;
- [b)] incrementing an event count based on performance measurement definitions for each of the filtered event notifications; and
- [c)] establishing event count information specific to each of the filtered event notifications based on event count criteria.

10. (Once Amended) The method of claim 7, wherein emitting an alarm when the event count exceeds a threshold comprises the steps of:

- [a)] comparing the event count information against a threshold;
- [b)] emitting an alarm to the [manager] Operations and Maintenance Center (OMC) if the event count information exceeds the threshold; and
- [c)] resetting the event count information if an alarm is emitted to the [manager] Operations and Maintenance Center (OMC).

11. (Once Amended) The method of claim 7, wherein the [manager] Operations and Maintenance Center (OMC) establishes criteria for selection of event notifications.

12. (Once Amended) The method of claim 7, wherein the [manager] Operations and Maintenance Center (OMC) requests creation of event counter objects having information on thresholding and alarm notification.

14. (Once Amended) An apparatus for reducing the number of event notifications sent to [a manager] an Operations and Maintenance Center (OMC) by a network element serviced by the OMC comprising:

[a)] means for filtering to provide filtered event notifications;

[b)] means for counting to generate event count information from the filtered event notifications; and

[c)] means for emitting alarms to the [manager] OMC.

15. (Once Amended) The apparatus of claim 14, wherein the filtering means comprise:

[a)] means for receiving the event notifications [from an agent]; and

[b)] means for selecting the event notifications based on filtering criteria to provide filtered event notifications.

16. (Once Amended) The apparatus of claim 14, wherein the counting means comprises:

[a)] means for receiving filtered event notifications from the filtering means;

[b)] means for incrementing an event count based on performance measurement definitions for each of the filtered event notifications; and

[c)] means for establishing event count information specific to each of the filtered event notifications based on event count criteria.

17. (Once Amended) The method of claim 14, wherein the means for emitting alarms to the [manager] Operations and Maintenance Center (OMC) comprise:

[a)] means for comparing the event count information against a threshold;

[b)] means for emitting an alarm to the [manager] Operations and Maintenance Center (OMC) if the event count information exceeds the threshold; and

[c)] means for resetting the event count information if an alarm is emitted to the [manager] Operations and Maintenance Center (OMC).

18. (Once Amended) The apparatus of claim 14, wherein the [manager] Operations and Maintenance Center (OMC) establishes filtering criteria for the filtering means.

19. (Once Amended) The apparatus of claim 14, wherein the [manager] Operations and Maintenance Center (OMC) requests creation of event count criteria for the counting means.